

Hold on COOLEY LLP
MICHAEL G. RHODES (116127)
(rhodesmg@cooley.com)
KYLE C. WONG (224021)
(kwong@cooley.com)
101 California Street, 5th Floor
San Francisco, California 94111-5800
Telephone: (415) 693-2000
Facsimile: (415) 693-2222

LINH K. NGUYEN (305737)
(lknguyen@cooley.com)
JAMIE D. ROBERTSON (326003)
(jdrobertson@cooley.com)
4401 Eastgate Mall
San Diego, California 92121
Telephone: (858) 550-6000
Facsimile: (858) 550-6420

Attorneys for Defendant
Twitter, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOHN DOE #1 AND JOHN DOE #2,

Plaintiffs,

V.

TWITTER, INC.,

Defendant.

Case No. 3:21-cv-00485-JCS

**DECLARATION OF KYLE C. WONG IN
SUPPORT OF DEFENDANT TWITTER, INC.'S
MOTION TO DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT**

Hearing Date: July 30, 2021
Hearing Time: 9:30 a.m.
Judge: Honorable Joseph C. Spero

1 I, Kyle C. Wong, declare as follows:

2 1. I am an attorney licensed to practice law in California and am special counsel at
 3 Cooley, LLP and counsel of record for Defendant Twitter, Inc. (“Twitter”) in the above captioned
 4 matter. I make this declaration based on my personal knowledge of this matter and information I
 5 obtained following a reasonable investigation of the events described below. If called as a witness,
 6 I could and would testify competently to the matters stated herein.

7 2. **Exhibit 1** is a true and correct copy of an article entitled “Twitter says it’s getting
 8 better at detecting abusive tweets without your help,” published by the news website Vox on April
 9 16, 2019, as the page appeared on May 5, 2021, and is publicly available on Vox’s website at
 10 <https://www.vox.com/2019/4/16/18410931/twitter-abuse-update-health-technology-harassment>.

11 3. **Exhibit 2** is a true and correct copy of a report entitled “A healthier Twitter:
 12 Progress and more to do,” published by Twitter on its online blog on April 16, 2019, as the page
 13 appeared on May 5, 2021, and is publicly available on Twitter’s website at
 14 https://blog.twitter.com/en_us/topics/company/2019/health-update.html.

15 4. **Exhibit 3** is a true and correct copy of a report entitled “Rules Enforcement,”
 16 published by Twitter on its website on January 11, 2021, as the page appeared on May 5, 2021, and
 17 is publicly available on Twitter’s website at <https://transparency.twitter.com/en/reports/rules-enforcement.html#2020-jan-jun>.

19 5. **Exhibit 4** is a true and correct copy of the homepage of the Technology Coalition,
 20 which identifies Twitter (by its iconic logo) as one of the members of the Technology Coalition, as
 21 the page appeared on May 5, 2021, and is publicly available on the Technology Coalition website
 22 at <https://www.technologycoalition.org/>.

23 6. **Exhibit 5** is a true and correct copy of an announcement entitled “The Technology
 24 Coalition Announces Project Protect: A plan to Combat Online Child Sexual Abuse,” posted by the
 25 Technology Coalition on its website on June 10, 2020, as the page appeared on May 5, 2021, and
 26 is publicly available on The Technology Coalition’s website at <https://www.technologycoalition.org/2020/05/28/a-plan-to-combat-online-child-sexual-abuse>.

28 7. **Exhibit 6** is a true and correct copy of the @BrossStraight Twitter account as the

page appeared on May 5, 2021, which shows the account is suspended, and is publicly available on Twitter's website at <https://twitter.com/BrossStraight/>.

8. **Exhibit 7** is a true and correct copy of one of Twitter's policies entitled "Ban Evasion Policy," published by Twitter on its website and last updated in October 2020, as the page appeared on March 10, 2021, and is publicly available on Twitter's website at <https://help.twitter.com/en/rules-and-policies/ban-evasion>.

9. **Exhibit 8** is a true and correct copy of one of Twitter's policies entitled "Illegal or certain regulated goods or services," published by Twitter on its website and last updated in April 2019, as the page appeared on May 5, 2021, and is publicly available on Twitter's website at <https://help.twitter.com/en/rules-and-policies/regulated-goods-services>.

I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed on May 7, 2021 in San Francisco, California.

Dated: May 7, 2021

/s/ Kyle C. Wong
Kyle C. Wong